

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 2:19-cr-00013
)	
v.)	Chief Judge Crenshaw
)	
GEORGIANNA A.M. GIAMPIETRO)	

UNITED STATES' SUBMISSION OF PROPOSED VERDICT FORM

The United States of America, by and through its attorneys, the United States Attorney for the Middle District of Tennessee and the Chief of the Counterterrorism Section of the National Security Division, United States Department of Justice, hereby files the Government's Proposed Verdict Form, which is attached hereto as Exhibit A. While the parties agree upon the verdict form as it relates to Counts Three and Four, the parties could not agree as to the verdict form on Counts One and Two, even after extensive consultation.

The Government specifically objects to the defense counsel's separately submitted verdict form for Counts One and Two as the Government does not believe unanimity as to the means by which the defendant committed Counts One and Two is necessary. Attached as Exhibit B to this filing, the Government is submitting a memorandum in support of its position on Counts One and Two.

Respectfully Submitted,

MARK H. WILDASIN
United States Attorney
Middle District of Tennessee

By: /s/ Kathryn Risinger
KATHRYN RISINGER
PHIL WEHBY
Assistant United States Attorneys
110 9th Avenue South
Nashville, Tennessee 37203
Phone: (615) 736-5151

/s/ Jennifer E. Levy
JENNIFER E. LEVY
Trial Attorney
Counterterrorism Section
U.S. Department of Justice
950 Pennsylvania Avenue, N.W., Ste. 7600
Washington, D.C. 20530
(202) 514-1092

CERTIFICATE OF SERVICE

I hereby certify that on December 26, 2021, I electronically filed one copy of the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to counsel for all defendants in this case.

/s/ Kathryn D. Risinger
KATHRYN D. RISINGER
Deputy Criminal Chief – Organized Crime